

APR 10 2019

CLD: USAO2019R0051

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

UNITED STATES OF AMERICA

CRIMINAL NO. *ELH-19-0183*

v.

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross,"
"Cooper Rose,"

Defendant.

(Bank Fraud, 18 U.S.C. § 1344(2);
Access Device Fraud, 18 U.S.C. §
1029(a)(2); Aggravated Identity
Theft, 18 U.S.C. § 1028A(a)(1) & (b);
Possession of Fraudulently Made
Government Seal, 18 U.S.C. §
506(a)(3); False Impersonation of an
Officer or Employee of the United
States, 18 U.S.C. § 912; Forfeiture, 18
U.S.C. § 982(a)(2)(A) and (a)(2)(B), 18
U.S.C. § 492, 28 U.S.C. § 2461(c))

INDICTMENT

COUNTS ONE THROUGH FOUR
(Bank Fraud)

The Grand Jury for the District of Maryland charges that:

On or about the dates listed below, in the District of Maryland and elsewhere, the
defendant,

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross," "Cooper Rose,"

knowingly and willfully executed and attempted to execute a scheme and artifice to obtain moneys
and funds owned by and under the custody and control of financial institutions with accounts
insured by the Federal Deposit Insurance Corporation and the National Credit Union Share
Insurance Fund, by means of materially false and fraudulent pretenses, representations and
promises, to wit: ROSENSTEEL executed checks drawn from financial institution accounts
belonging to other people, in the names of other people, without authority or consent, and deposited
the forged checks into his personal bank account, as follows:

Count	Date	Bank Account Drawn From	Bank Account Deposited Into	Approximate Amount	Victim
1	January 17, 2018	Check # 0063428248 Bank of America Acct # 8316	Wells Fargo Bank Acct. # 0476	\$3,500.00	R.R.
2	December 21, 2018	Check # 1531 Franklin Synergy Bank Acct # 5358	Wells Fargo Bank Acct. # 0476	\$4,361.55	K.G. & M.F.S.
3	January 3, 2019	Check # 1006 Navy Federal Credit Union Acct # 5579	Wells Fargo Bank Acct. # 0476	\$1,000.00	N., LLC & R.K.
4	January 18, 2019	Check # 1964 M&T Bank Acct # 8502	Wells Fargo Bank Acct. # 0476	\$800.00	T.G.

18 U.S.C. § 1344(2)

COUNT FIVE
(Access Device Fraud)

The Grand Jury for the District of Maryland charges that:

Between on or about September 23, 2018 through January 23, 2019, in the District of Maryland and elsewhere, the defendant,

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross," "Cooper Rose,"

knowingly and with intent to defraud, in and affecting interstate and foreign commerce, did use and attempt to use, one and more access devices as defined in 18 U.S.C. § 1029(e)(3), and by such conduct, obtained things of value in an amount of \$1,000.00 or more during a one year period of time, to wit: **ROSENSTEEL** obtained and used stolen credit and debit cards, issued to other people, to make unauthorized transactions and purchases, as follows:

Date	Access Device	Approximate Amount	Victim
September 23, 2018 – November 14, 2018	Citibank Visa Credit Card # 6726	\$5,815.07	L.S.
September 24, 2018 – September 25, 2018	Home Depot Credit Card # 5677	\$290.98	L.S.
December 11, 2018 – January 25, 2019	Bank of America Debit Card # 1491	\$1,033.19	K.G. & E.C.F.I.
December 24, 2018 – January 4, 2019	M&T Bank Debit Card # 4116	\$1,506.37	S.G.
January 15, 2019	Discover Credit Card # 9589	\$1.00	T.G.
January 15, 2019 – January 16, 2019	Citibank Credit Mastercard # 7424	\$121.50	T.G.
January 22, 2019 – January 23, 2019	Navy Federal Debit Card # 3361	\$189.05	M.G. & H.G.

18 U.S.C. § 1029(a)(2)

COUNT SIX - SIXTEEN
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland charges that:

From at least on or about January 17, 2018, up to and including January 23, 2019, in the District of Maryland and elsewhere, the defendant,

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross," "Cooper Rose,"

knowingly transferred, possessed and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit: Bank Fraud, in violation of 18 U.S.C. § 1344(2) and Access Device Fraud, in violation of 18 U.S.C. § 1029(a)(2), as alleged in this Indictment, knowing that the means of identification belonged to another person, as follows:

Count	Date	Means of Identification Used	During / In Relation To
6	January 17, 2018	The name of R.R.	Count One
7	December 21, 2018	The name of K.G.	Count Two
8	January 3, 2019	The name of N., LLC	Count Three
9	January 18, 2019	The name of T.G.	Count Four
10	September 23, 2018 – November 14, 2018	A credit card and number belonging to L.S.	Count Five
11	September 24, 2018 – September 25, 2018	A credit card and number belonging to L.S.	Count Five

12	December 11, 2018 – January 25, 2019	A debit card and number belonging to K.G. & E.C.F.I.	Count Five
13	December 24, 2018 – January 4, 2019	A debit card and number belonging to S.G.	Count Five
14	January 15, 2019	A credit card and number belonging to T.G.	Count Five
15	January 15, 2019 – January 16, 2019	A credit card and number belonging to T.G.	Count Five
16	January 22, 2019 – January 23, 2019	A debit card and number belonging to M.G. & H.G.	Count Five

18 U.S.C. § 1028A(a)(1) & (b)

COUNT SEVENTEEN
(Possession of Fraudulently Made Government Seal)

The Grand Jury for the District of Maryland charges that:

On or about August 3, 2018, in the District of Maryland and elsewhere, the defendant,

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross," "Cooper Rose,"

with fraudulent intent, possessed a counterfeit and fraudulently made seal of a department and agency of the United States and facsimile thereof, namely, a United States Secret Service badge with a United States Secret Service Seal, purportedly issued by the United States Secret Service, knowing that the United States Secret Service seal was counterfeit and fraudulently made, to wit:

ROSENSTEEL possessed the following replica United States Secret Service badge:



18 U.S.C. § 506(a)(3)

COUNT EIGHTEEN
**(False Impersonation of an
Officer or Employee of the United States)**

The Grand Jury for the District of Maryland charges that:

On or about August 3, 2018, in the District of Maryland and elsewhere, the defendant,

IGOR COOPER ROSENSTEEL,
a/k/a "Cooper Ross," "Cooper Rose,"

did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, to wit; **ROSENSTEEL** pretended to be an agent and employee of the United States Secret Service, and while so pretending, acted with the intent to cause a person to follow some course of action and inaction by displaying a United States Secret Service badge and falsely claiming he was employed by the United States Secret Service during and in relation to traffic stop conducted by a Maryland Transportation Authority Police officer who was investigating a traffic violation.

18 U.S.C. § 912

FORFEITURE

1. The allegations of Counts One through Seventeen of this Indictment are incorporated herein for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B); 18 U.S.C. § 492; and 28 U.S.C. § 2461(c).

2. Upon conviction of one or more the offenses in violation of 18 U.S.C. § 1344(2), 18 U.S.C. § 1029(a)(2), and 18 U.S.C. 1028A(a)(1) and (b), charged in Counts One through Sixteen of this Indictment, the defendant,

IGOR COOPER ROSENSTEEL

a/k/a "Cooper Ross," "Cooper Rose,"

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B), any property that constitutes or is derived from proceeds obtained, directly or indirectly, as a result of the offenses, or is otherwise traceable to the offenses.

3. Upon conviction of the offense in violation of 18 U.S.C. § 506(a)(3) charged in Count Seventeen of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c), all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; any articles, devices, and other things made, possessed, or used in violation of 18 U.S.C. § 506(a)(3); and any material or apparatus used or fitted, or intended to be used, in the making of such counterfeits, articles, devices or things, found in the possession of the defendant without proper authority. The property to be forfeited includes, but is not limited to, the following: a replica United States Secret Service Special Agent Badge.

4. If any of the property subject to forfeiture, as a result of any act or omission of the

defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty

the United States of America shall be entitled to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture, pursuant to 21 U.S.C. § 853(p).

All pursuant to 18 U.S.C. § 982(a)(2)(A) and (a)(2)(B); 18 U.S.C. § 492; and 28 U.S.C. § 2461(c).

SIGNATURE REDACTED

FOREPERSON

Robert Hur / cld
Robert Hur
United States Attorney

Date

April 10, 2019